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Of Attorneys for Vahan M. Dinihanian, Jr.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

15005 NW Cornell LLC,
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under
Case No. 19-31883-dwh11

DEBTOR'S UNOPPOSED MOTION TO
EXTEND TIME TO FILE LIQUIDATION
ANALYSIS

Vahan M. Dinihanian, Jr. (the “**Debtor**”), hereby moves this Court for the entry of an Order extending the deadline by which the Liquidation Analysis (the “**Motion**”) must be filed from October 16, 2020 to October 19, 2020. In support of the Motion, Debtor asserts the following:

1. The Court ordered that Debtor file a liquidation analysis by the close of business day on October 16, 2020.
2. Counsel for Debtor has been in depositions on another matter for the past two days and needs more time to prepare the liquidation analysis.

3. Counsel has conferred with opposing counsel and there is no objection to extending the deadline to file the Liquidation Analysis to October 16, 2020.

WHEREFORE, the Debtor prays for the Court to enter an Order in the form attached hereto as **Exhibit 1**, extending the deadline by which the Debtor's Liquidation Analysis must be filed, from October 16, 2020 to October 19, 2020.

DATED: October 16, 2020

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027

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Of Attorneys for Debtor Vahan M. Dinihanian,
Jr.

EXHIBIT 1

PROPOSED ORDER

UNITED STATES BANKRUPTCY COURT
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THIS MATTER having come before the Court on the Unopposed Motion to Extend Time
to File Liquidation Analysis filed by Vahan M. Dinihanian, Jr. ("**Debtor**"). The Court having
reviewed the motion, and being otherwise duly advised; now, therefore,

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IT IS HEREBY ORDERED as follows:

- 1) Debtor's Motion to Extend Time is GRANTED.
- 2) The Debtor shall file the Liquidation Analysis by October 19, 2020.

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Order Presented by:

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027

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Of Attorneys for Debtor Vahan M. Dinihanian, Jr.

PARTIES TO SERVE:

ECF Electronic Service: All participants.

Service via First-Class Mail: None.